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November 2, 2022

VIA ECF

Honorable Michael A. Hammer
United States District Court for the
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street Room 2C
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow Mr. Goetsche to travel to the Southern District of New York in December 2022 for in-person meetings with the undersigned counsel. The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services" and restricts his travel to the District of Colorado and the District of New Jersey. On October 15, 2021, the Court allowed a similar proposed modification to allow for in-person meetings in New York with the undersigned counsel (dkt. 224).

The proposed modifications to the Court's Release Order are as follows:

- A detailed travel itinerary of flights and lodging shall be provided to Pretrial Services for review and approval in advance of travel.
- Mr. Goetsche shall remain in the presence of a third-party custodian, during travel and while in New York except during in-person meetings with his attorneys of record at either Kobre & Kim LLP, 800 Third Avenue, New York, New York or Smith Villazor LLP, 250 West 55th Street, New York, New York.
- Mr. Goetsche may eat at a restaurant within midtown Manhattan (south of 60th Street and north of 42nd Street) accompanied at all times by either his third-party custodian or the attorneys of record provided the location and time is disclosed to Pretrial Services in advance.
- Except for in-person meetings with attorneys or such meals, Mr. Goetsche shall otherwise remain at the hotel in New York in the presence of a third-party custodian during the duration of the trip under all applicable bail conditions.

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Pretrial Services has no objection to our proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.
SMITH VILLAZOR LLP

cc: Matthew Menchel, Esq.
Amanda Tuminelli, Esq.
Government counsel of record (via ECF and e-mail)
U.S. Pretrial Services Officer David Hernandez (via e-mail)
U.S. Pretrial Services Officer Troy Ruplinger (via e-mail)